

1 THE HONORABLE THOMAS S. ZILLY
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 HARMONY GOLD U.S.A., INC.,

12 Case No. 2:17-cv-00327-TSZ

13 Plaintiff(s),

14 vs.

15 HAREBRAINED SCHEMES LLC,
16 HAREBRAINED HOLDINGS, INC.,
17 JORDAN WEISMAN, PIRANHA
18 GAMES INC., INMEDIARES
19 PRODUCTIONS, LLC, and DOES 1-10,

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25 **JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
CASE DEADLINES**

Defendants.

STIPULATION

26 Plaintiff Harmony Gold U.S.A., Inc. (“Harmony Gold”) and Defendants Harebrained
27 Schemes LLC, Harebrained Holdings, Inc., Jordan Weisman, and Piranha Games Inc.
28 (“Defendants”) (collectively, the “Parties”), by and through their undersigned counsel,
29 respectfully submit the following stipulation:

30 On May 12, 2017, the Court issued a Minute Order Setting Trial Date and Related Dates
31 in this action (Dkt. 35);

1 On June 28, 2017, the clerk issued an Order of Default against Defendant InMediaRes
2 Productions, LLC for failing to timely plead or otherwise defend in this action (Dkt. 42);

3 Plaintiff Harmony Gold changed counsel in October 2017 (Dkt. 46);

4 On November 13, 2017, Defendant Piranha Games Inc. filed a Motion for Summary
5 Judgment (Dkt. 47), which was joined by Defendants Harebrained Schemes LLC, Harebrained
6 Holdings, Inc. and Jordan Weisman (Dkt. 54) which is currently pending before the Court;

7 On November 22, 2017, Plaintiff Harmony Gold filed a Motion for Leave to Amend
8 Amended Complaint (Dkt. 51), which is currently pending before the Court;

9 The Parties wish to defer further discovery until April 2, 2018, to avoid incurring fees
10 and expenses that may be wasted depending upon the outcome of the pending motions; and

11 For the above reasons, and to secure the just, speedy, and inexpensive determination of
12 this action, the Parties agree that it is for the mutual benefit of all of the Parties to continue the
13 current case deadlines in this action. The Parties do not anticipate the need for any further
14 extensions of these deadlines, and they will be prepared to proceed with the case pursuant to the
15 schedule set forth below.

16 THE PARTIES STIPULATE, through their respective counsel, and jointly move the
17 Court, to extend the following deadlines:

18 Deadline to file motions related to discovery: July 16, 2018

19 Fact discovery cut-off: September 3, 2018

20 Disclosure of expert testimony and expert reports: September 3, 2018

21 Expert discovery cut-off: October 15, 2018

22 Deadline to file dispositive motions: November 1, 2018

23 Deadline to file motions in limine: January 4, 2019

24 Agreed pretrial order: January 11, 2019

Deadline to file trial briefs, proposed voir dire questions and jury instructions:
January 11, 2019

Pre-trial conference: January 18, 2019 at 1:30 p.m.

Jury trial date: February 1, 2019

IT IS SO STIPULATED.

DATED this 2nd day of February, 2018.

CALFO EAKES & OSTROVSKY PLLC

By s/ Andrew R.W. Hughes

Andrew R.W. Hughes, WSBA #49515

Damon C. Elder, WSBA# 46754

1301 Second Avenue, Suite 2800

Seattle, WA 98101

Phone: (206) 407-2200

Fax: (206) 407-2224

damone@calfoeakes.com

LATHAM & WATKINS LLP

By *s/Jessica Stebbins Bina*

Jessica Stebbins Bina

10250 Constellation Blvd., Suite 1100

Los Angeles, CA 90067

Phone: (424) 653-5525

Facsimile: (424) 653-5501

Email: Jessica.stebbinsbina@lw.com

Attorneys for Plaintiff Harmony Gold U.S.A., Inc.

1 DORSEY & WHITNEY LLP
2

3 By s/Todd S. Fairchild

4 Paul T. Meiklejohn, WSBA #17477
5 J. Michael Keyes, WSBA #29215
6 Todd S. Fairchild, WSBA #17654
7 Ryan B. Meyer, WSBA #37832
701 Fifth Avenue, Suite 6100
Seattle, WA 98104
Phone: (206) 903-8800
Fax: (206) 903-8820

8 *Attorneys for Defendant Piranha Games Inc.*

9
10 DAVIS WRIGHT TREMAINE LLP
11

12 By s/James Harlan Corning

13 Warren J. Rheaume, WSBA #13627
14 James Harlan Corning, WSBA #45177
1201 Third Avenue, Suite 2200
15 Seattle, WA 98101
Phone: (206) 622-3150
16 Fax: (206) 757-7700
Email: warrenrheaume@dwt.com
jamescorning@dwt.com

17
18 *Attorneys for Defendants Harebrained Schemes LLC,*
19 *Harebrained Holdings, Inc., and Jordan Weisman*

[PROPOSED] ORDER

The following Order is made by direction of the Court, the Honorable Thomas S. Zilly, United States District Judge:

Pursuant to the Parties' stipulation, and having examined the records and being fully advised in the matter, now, therefore,

IT IS HEREBY ORDERED that the following deadlines are continued as set forth below:

Deadline to file motions related to discovery	July 16, 2018
Fact discovery cut-off	September 3, 2018
Disclosure of expert testimony and expert reports	September 3, 2018
Expert discovery cut-off	October 15, 2018
Deadline to file dispositive motions	November 1, 2018
Deadline to file motions in limine	January 4, 2019
Agreed pretrial order	January 11, 2019
Deadline to file trial briefs, proposed voir dire questions and jury instructions	January 11, 2019
Pre-trial conference	January 18, 2019 at 1:30 p.m.
Jury trial date	February 1, 2019

1 All other dates and deadlines not inconsistent with this Order, contained in the Minute
2 Order Setting Trial Date and Related Dates, docket no. 35, including the deadlines for joining
3 additional parties and amending pleadings, shall remain in full force and effect.

4 DATED this _____ day of February, 2018.
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THE HONORABLE THOMAS S. ZILLY
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

The undersigned certifies that on February 2, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

DATED this 2nd day of February, 2018.

s/ Mary J. Klemz

Mary J. Klemz